

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION

UNITED STATES OF AMERICA,                          )  
  )  
Plaintiff,    )  
  )  
v.   )    1:14 CR 90  
  )  
Paul Michael Corbi,                                    )  
  )  
Defendant.    )  
  )

**Motion Regarding Proper Pre-trial Jail Credit**

COMES NOW the Defendant, by and through the undersigned counsel, and with the consent of the United States, by and through Assistant United States Attorney Tom Kent as evidenced by the attached email,

AND presents to this Court pursuant to a request of the Court on March 29, 2016 at the time of sentencing, and it appears that both parties have researched this issue and come to the same conclusion,

1.     The Defendant was arrested by the State of North Carolina for these charges (later charged by the United States) on or about July 18<sup>th</sup>, 2014, and released the same day.
2.     He was rearrested on or about August 1, 2014, and released the next day.
3.     He was then arrested on November 23, 2014 and has remained in custody since that time.
4.     Therefore, the Defendant would be entitled to 1 day of jail credit from July, 2014, plus 2 days from August, 2014, then credit from November 23, 2014 forward.

WHEREFORE the Defendant prays the Court for consideration of the jail credit.

Respectfully submitted this the 1st day of April, 2016.

WILLIAMS & MILLS, PLLC.  
17 North Market Street  
Suite 202  
Asheville, NC 28801  
828-255-0100

By: \_\_\_\_\_ s/James H. Mills

James H. Mills  
NC State Bar # 27977  
[jamesmills@williamsandmillslaw.com](mailto:jamesmills@williamsandmillslaw.com)

## CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that the foregoing document was served on the United States Attorney's office by leaving a copy of said document at counsel's office with a responsible employee therein, by hand delivery or by depositing a copy of the same with the U.S. Postal Service, first-class postage prepaid, or by service through the ECF system to the addressee below:

Tom Kent  
U.S. Attorneys Office

This the 1st day of April, 2016.

WILLIAMS & MILLS, PLLC.  
17 North Market Street  
Suite 202  
Asheville, NC 28801  
828-255-0100

By: \_\_\_\_\_ s/James H. Mills \_\_\_\_\_  
James H. Mills  
NC State Bar # 27977  
jamesmills@williamsandmillslaw.com